



Sacramento  
Area Flood  
Control  
Agency

December 29, 2007

Jay Punia, General Manager  
The Reclamation Board  
3310 El Camino Ave., Suite LL40  
Sacramento, CA 95821

**Subject: Support for Addressing Geotechnical Deficiencies in a Portion of the Federal Project Levee System Protecting the Natomas Basin in Sacramento and Sutter Counties**

Dear Mr. Punia:

This letter is respectfully submitted by the Sacramento Area Flood Control Agency (SAFCA) to seek support from The California Reclamation Board (Reclamation Board) for addressing serious geotechnical deficiencies in a portion of the federal project levee along the south levee of the Natomas Cross Canal (NCC) that protects the Natomas Basin in Sacramento and Sutter Counties. A failure of this levee would imperil over 70,000 people, several billion dollars of damageable property, and some of Sacramento's most critical public infrastructure, including the Sacramento International Airport and Interstate Highway 5.

The necessary remedial work would be consistent with the objectives of the American River Common Features Project (Common Features Project) and could qualify for credit that would reduce future non-federal contributions to this project. This work would constitute the first phase of larger levee improvement program that is aimed at providing the Natomas area with "200-year" urban standard flood protection over the next several years. SAFCA requests the Reclamation Board's support for this effort through the timely issuance of a letter requesting federal credit for the phase 1 work along the NCC south levee and the issuance of the permits necessary to proceed with this work in the summer of 2007.

SAFCA has previously submitted applications for a programmatic encroachment permit covering the overall Natomas Levee Improvement Program (Natomas Program) and for an individual encroachment permit covering the Phase 1 NCC Levee Improvements (Phase 1 Improvements). These submittals provide a general description of the "200-year" urban standard flood protection project and a detailed description of the proposed work along the NCC south levee, with reference to the supporting engineering feasibility and environmental impact reports which SAFCA has

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issued to date. Based on this information, SAFCA believes that the Natomas Program and the Phase 1 Improvements meet the following criteria:

- These improvements are critically needed to protect the people and property at risk in the Natomas area and will contribute to reducing the State's liability for flood damages. As noted in the *Draft Program Environmental Impact Report on Local Funding Mechanisms for Comprehensive Flood Control Improvements for the Sacramento Area (Draft EIR)*, SAFCA's proposed flood risk reduction program includes a special benefit assessment on properties within the "200-year" floodplain to finance the local share of the cost of constructing and maintaining the improvements necessary to provide these properties with "200-year" urban standard flood protection. In addition, SAFCA's program includes a development impact fee to ensure that new development in the "200-year" floodplain does not substantially increase the expected damage of an uncontrolled flood.

- SAFCA anticipates that the Phase 1 Improvements will be ready for implementation in the summer of 2007. This will require completion of the environmental review process, which will occur in February 2007; issuance of the necessary Reclamation Board encroachment permit, which is expected to occur in March 2007; successful formation of the above-referenced special benefit assessment district, which is expected to occur in April 2007; and execution of project cost sharing agreement with the State, which is expected to occur in May 2007.

- SAFCA believes that the Natomas Program as a whole and the Phase 1 Improvements as an incremental element are economically feasible based on current cost estimates for these improvements, the amount of damageable property that would be protected in the Natomas Basin, the amount of damage that would likely occur in a single uncontrolled flood event, and the current annual risk of such an uncontrolled flood.

- Although neither the Natomas Program nor the Phase 1 Improvements involves a relocation or setback of any project levee, as discussed in the Draft EIR, SAFCA seriously considered such an option along the upper reach of the east levee of the Sacramento River. However, because of the risk of altering the hydraulics governing the flow split at the Fremont Weir; the potential impact of a levee setback on existing permitted residences along the Garden Highway in Sutter County; the potential for the setback area to attract wildlife into the flight path of aircraft utilizing Sacramento International Airport; and the existence of an underseepage gradient extending far into the floodplain on the landside of the existing levee, SAFCA determined that the setback levee alternative was not feasible and it was not carried forward.

- SAFCA believes that the Natomas Program and the Phase 1 Improvements will qualify for federal credit under Section 104 of the Water Resources Development Act of 1986. These improvements incorporate portions of the federally authorized Common Features Project and are designed to achieve the flood protection objectives of that project. SAFCA has completed the *Natomas Levee Evaluation Study* (Final Report, July 2006), a reconnaissance level feasibility study indicating that there is a likely a federal interest in

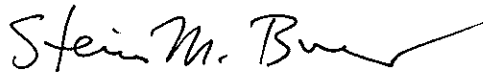
broadening the scope and raising the cost ceiling of the Common Features Project to include these improvements. SAFCA anticipates that the Corps will complete a General Re-evaluation Report on the Common Features Project for submittal to Congress in 2009 and that this report will serve as the basis for the authorizations that will secure credits for any prior non-federal expenditures on project design and construction work.

- Finally, SAFCA is working closely with the City of Sacramento and the County of Sacramento to refine existing emergency response plans for the Natomas area which these agencies have developed and presented to the public over the past year.

For these reasons, SAFCA believes the Natomas Program and, more particularly, the Phase 1 Improvements are worthy of the Reclamation Board's support. Accordingly, we request the Board's cooperation in issuing a letter requesting federal credit for the Phase 1 Improvements and in processing our application for an encroachment permit for this work so that it may get under way this summer.

If you have any questions in this regard, please don't hesitate to give me a call.

Sincerely,

A handwritten signature in black ink, appearing to read "Stein M. Buer", with a long horizontal flourish extending to the right.

Stein M. Buer  
Executive Director